



M O S K O W I T Z & B O O K , L L P

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March 25, 2021

**By ECF**

Hon. P. Kevin Castel  
U.S. District Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Geovanny Fuentes Ramirez  
S6 15 Cr. 379 (PKC)

Dear Judge Castel:

On behalf of defendant Geovanny Fuentes Ramirez, I respectfully request that the Court extend the defendant's time to file post-trial motions pursuant to Rules 29 and 33 of the Federal Rules of Criminal procedure through and including April 23, 2021. The reason for this request is that the Passover holiday, coupled with the press of other work that was pushed back during trial and must now be completed, will make it impossible to complete the required research and briefing within the 14-day period otherwise provided by the Rules.

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink that reads 'Avraham C. Moskowitz'.

Avraham C. Moskowitz

cc: Eylan Schulman, Esq. (by email)